## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

JONATHAN ZUHOVITZKY	)
Plaintiff,	<i>)</i> )
	No. 20 Civ. 4937 (JGK)
-against-	)
	) NOTICE OF MOTION
THE UNITED STATES OF AMERICA; THE	)
UNITED STATES DEPARTMENT OF THE	)
TREASURY; THE UNITED STATES INTERNAL	)
REVENUE SERVICE; FHIRDOSA KHATIB (in her	)
Capacity both as a Federal Employee and Individually; and	)
JENNIFER SAWYER (in her capacity both as a Federal	)
Employee and Individually).	)
	)
Defendants.	)
	)

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiff's Motion for Partial Summary Judgment and Objections to Defendant's Motions for Summary Judgement and to Dismiss, Plaintiff's Rule 56.1 Statement of Undisputed Material Facts, the Declaration of Esther J. Zuhovitzky, and the Declaration of Melissa A. Perry, along with the accompanying exhibits, Plaintiff Jonathan Zuhovitzky, by his attorney, Melissa A. Perry, hereby moves this Court for an Order granting summary judgment in part pursuant to Rule 56 of the Federal Rules of Civil Procedure and denying Defendants' Motions for Summary Judgment and to Dismiss.

COHEN, LABARBERA & LANDRIGAN, LLP

Dated: February 12, 2021 Chester, New York Melissa A. Perry, Esq. 99 Brookside Avenue Chester, New York 10918

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